



Jacob Z. Weinstein, Esq.
Direct: 646-450-3484
E-Mail: Jacob@WeinsteinLLP.com

Israel D. Weinstein, Esq.*
Direct: 212-810-2143
E-Mail: Israel@WeinsteinLLP.com
*Also Licensed In New Jersey

May 25, 2022

Via ECF

Hon. John P. Cronan
District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street.
New York, NY 10007-1312

Re: *S. v. The Union of Orthodox Jewish Congregations
of America Inc., et. al.,*
19-CV-11566 (JPC)

Honorable Judge Cronan:

We represent Plaintiff in the above-mentioned action. Pursuant to Your Honor's Order, Doc. 74, Plaintiff wishes to submit any materials in support of the Court's approval of the settlement, along with a proposed infant compromise order. Such material is due on or before June 1, 2022. As such, in accordance with your Honor's Individual Rule 4, due to the nature of said documents, the Parties have conferred, and wish that supporting documents and proposed infant compromise order be filed under seal.

The presumption to public access is outweighed in this case by the substantial interests in (1) promoting the confidentiality of settlement negotiations and any resulting agreements in order to facilitate settlement; and (2) protecting the infant plaintiff's privacy interests. *See, e.g. Leonard as Tr. of Poplawski 2008 Ins. Tr. v. John Hancock Life Ins. Co. of New York*, No. 18-CV-4994-AKH, 2020 WL 1547486 (S.D.N.Y. Mar. 31, 2020).

Respectfully:

Plaintiff shall submit the sealing request at the time of the filing of the proposed infant compromise order and supporting documents and in accordance with 4.B of the Court's Individual Rules and Practices in Civil Cases.

_____/s/_____
Jacob Z. Weinstein
Counsel for Plaintiff

cc: Defendants' Counsel (via ECF) **SO ORDERED.**

Date: May 26, 2022
New York, New York


JOHN P. CRONAN
United States District Judge

499 Chestnut Street, Suite 213, Cedarhurst New York 11516